

ESOHMS Overview

DLA Strategic Materials
December 2014

ESOHMS Message To All Staff

***ESOHMS applies to everyone
and every job/role***

- ▶ ESOHMS applies equally to field/office/HQ staff and those working on behalf of DLA Strategic Materials.



ESOHMS 101

- ▶ What is an ESOHMS?
- ▶ Why have one?
- ▶ DLA SM's ESOHMS Policy
- ▶ How does the ESOHMS apply to me?
(Roles and Responsibilities)
- ▶ What programs does the ESOHMS include?
- ▶ ESOHMS resources (I Am The Key)



What is an ESOHMS?

- An Environmental, Safety, and Occupational Health Management System (ESOHMS) is
 - A system for planning and achieving responsible environmental management and health and safety
 - Is based on a continual cycle of improvement



What are ISO14001 & OSHAS 18000?

- ▶ DLA SM's ESOHMS conforms with the ISO 14001 and OSHAS 18001 standards
 - ▶ International Organization for Standards (ISO) 14001
 - ▶ “Environmental management systems - Specification with guidance for use”
 - ▶ ISO system intended to help reduce waste management costs, save in energy consumption, lower distribution costs, improve corporate image among regulators and the public, etc.
 - ▶ British Standards Institute (BSI) Occupational Health and Safety Assessment Series (18001)
 - ▶ “Occupational Health and Management Series”
 - ▶ Helps to control occupational healthy and safety risks



ESOH Policy Statement

Management Review (Act)

Checking & Corrective Action (Check)

- Monitoring and Measurement
- Nonconformance/ Corrective and Preventive Action
- Records
- Audits

Implementation & Operation (Do)

- Structure and Responsibility
- Training, Awareness, and Competence
- Communication
- Document Control
- EMS Documentation
- Operational Control
- Emergency Preparedness and Response

Planning (Plan)

- Environmental Aspects and Safety & Occupational Health Risk Assessment
- Legal and Other Requirements
- Objectives and Targets
- Mgmt. Programs



Why have an ESOHMS?

Executive Order 13423: *Strengthening Federal Environment, Energy and Transportation Management*

- ▶ Each Federal Agency must implement EMS at all appropriate organizational levels
- ▶ EMS must:
 - ▶ be used as the primary management approach for addressing the environmental aspects of internal operations and activities
 - ▶ be reviewed annually by senior management
 - ▶ include proactive communications with interested parties

Executive Order 13514: *Federal leadership in Environment, Energy and Economic Performance*

- ▶ Continue to implement the Environmental Management System (EMS)



- ▶ at all appropriate organizational levels
- ▶ to achieve the performance necessary to meet the EO goals
- ▶ Gives specific deadlines for “goals” (i.e. reduce petroleum consumption by 2% annually until 2020)



Why have an ESOHMS?

- ▶ Supports sustainability
- ▶ Improved environmental performance
- ▶ Improved occupational health and safety
- ▶ Reduced operational costs
- ▶ Improved compliance
- ▶ Improved process efficiency
- ▶ Fewer overlaps and gaps between programs
- ▶ Maximize use of existing capabilities
- ▶ *Proactive versus reactive*



DLA Strategic Material's ESOHMS: The Basics



ESOHMS Policy

Environmental, Safety, and Occupational Health (ESOH) management must be a sound, useable business practice for systematically upgrading the overall performance of the DLA Strategic Materials. It must be a daily and active tool used by all to accomplish our mission and meet our strategic goals.

We will continue our commitment to ESOH stewardship by reducing risk and pollution, and assuring compliance with legal and other requirements that relate to our ESOH aspects. Our ESOHMS must be an integral part of our work with contractors, host facility owners, communities, and employees to provide ever-improving support for the war-fighter.

Therefore, I am directing that we maintain, improve, and use the mission-focused ESOHMS in order to conform to the International Organization for Standardization ISO 14001 Standard. To assure that we realize full value from this practice, we will continue to conduct periodic conformance and compliance audits at each manned depot.

We will integrate the ESOHMS into our missions, activities, and functions as a sound business practice for improving overall performance. We will collaborate with the DLA Field Activities and Installation Support to set and implement objectives and targets that improve ESOH and mission performance. Strategic Materials leaders will ensure that this policy is communicated to all employees and contractors who work on our behalf. This policy statement will be posted on the "I Am The Key" Web site to inform the public of our commitment.

We will strive to support our customers, the DLA mission and our strategic goals; and make efforts to continually improve our ESOH management practices. As employees, your active leadership, personal commitment, and involvement are essential to meeting these goals.

The Five Commandments of the ESOHMS:

1. Be Safe



2. Recycle



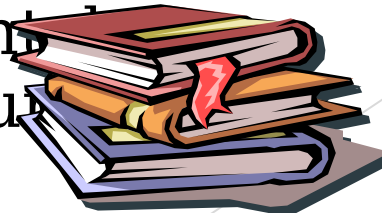
3. Conserve Our Natural Resources



4. Understand Your Job Responsibilities



5. Know What Environmental Regulations Apply to You



How does the ESOHMS apply to *INDIVIDUALS*?

- ▶ All employees need to
 - ▶ Be aware of the ESOHMS policy
 - ▶ Proactively work to minimize environmental and health and safety risks to make a better workplace for all
 - ▶ Fulfill roles and responsibilities as required by the ESOHMS policies and procedures

Everyone needs to work together to make the ESOHMS successful!



How does the ESOHMS apply to *Operations*?

- ▶ Operations plays a key role in the execution of DLA SM's mission by implementing ESOHMS policies and procedures daily through logistics planning.



How does the ESOHMS apply to *Depots*?

- ▶ Depot operations represent the greatest risk of an H&S mishap or environmental impact that could affect the health and safety of our staff.
- ▶ Depot staff must implement ESOHMS procedures to minimize potential H&S or environmental impacts
- ▶ Depot orientation guides



How does the ESOHMS apply to *Contractors*?

- ▶ Contracts need to include language requiring contractors to comply with the ESOHMS policy and procedures and all applicable federal and state regulations.
- ▶ Depot staff must observe contractors and verify that they follow ESOH policies and procedures.



What programs does the ESOHMS include?

- ▶ Environmental programs, including:
 - ▶ Water
 - ▶ Storm water
 - ▶ Oil Pollution Prevention (Spill Prevention, Control, and Countermeasure [SPCC])
 - ▶ Waste
 - ▶ Solid Waste
 - ▶ Hazardous Waste
 - ▶ Universal Waste
 - ▶ Natural Resources, Cultural Resources
- ▶ Safety programs, including:
 - ▶ Respiratory Protection
 - ▶ Personal Protective Equipment
 - ▶ Ergonomics
 - ▶ Radiation
 - ▶ Pest Management
- ▶ And More!



Interpretive Guidance Documents (IGDs)

- ▶ DLA SM has documented the ESOHMS in Interpretive Guidance Documents (IGDs)
- ▶ IGD 1000 - IGD 1019 describe how DLA SM implements each section of the ESOHMS, such as:
 - ▶ Policy
 - ▶ Aspects & Impacts
 - ▶ Communication
 - ▶ Training
 - ▶ Etc



ESOHMS Resources

- ▶ I Am The Key!
 - ▶ <http://www.strategicmaterials.dla.mil/iamthekey/Pages/default.aspx>
 - ▶ Includes the ESOHMS Manual and Interpretive Guidance Documents (IGDs) that dictate ESOHMS implementation



ESOHMS Plan

September 2014

Picturing the ESOHMS

ESOH Policy Statement

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- Communication
- Document Control
- EMS Documentation
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- Emergency Preparedness & Response

Planning (Plan)

- Environmental Aspects and Safety & Occupational Health Risk Assessment
- Legal and Other Requirements
- Objectives and Targets
- Mgmt. Programs



PLAN Agenda

- ▶ Requirements and IGD Overview
 - ▶ General (IGD 1000)
 - ▶ ESOH Policy (IGD 1001)
 - ▶ Environmental Aspects (IGD 1002)
 - ▶ Legal and Other Requirements (IGD 1003)
 - ▶ Objectives and Targets (IGD 1004)
 - ▶ ESOH Management Programs (IGD 1005)
 - ▶ Occupational Health and Safety Management Programs (IGD 1005)



Environmental Definitions

- ▶ **Aspect:** A characteristic or outcome of a practice that has the potential to affect the environment if not controlled
 - ▶ *Examples: Evaporation of solvents, generation of hazardous wastes, spills/releases, Fluorescent bulbs*
- ▶ **Impact:** Effects that aspects have upon resources
 - ▶ *Examples: Air quality degradation, hazardous work conditions, negative public perception, degradation to land and GW quality*
- ▶ **Objective:** Overall environmental goal, consistent with the environmental policy that an organization sets itself to achieve
 - ▶ *Example: Reduce air emissions, reduce fluorescent bulb waste*
- ▶ **Target:** Detailed performance requirement, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives
 - ▶ *Example: Reduce air emission by 10 percent by CY 2015, using CY 2010 data as a baseline., reduce fluorescent bulbs 20% by 2012*



SOH Definitions

- ▶ **Risk:** The possibility of suffering harm or loss, danger
- ▶ **Hazard:** An unavoidable danger or risk, even though often foreseeable
 - ▶ *For a **risk** to be present, there must be a **hazard** present*



General – IGD 1000

- ▶ IGD provides general guidance for the Environmental, Safety and Occupational Health Management System (ESOHMS)
- ▶ Applies to the Administrator and Front Office, Directorate of Material Management and all staffed Depots, those working on our behalf, and other strategic business units that use the Corporate or facility specific IGDs
- ▶ Management system is based upon ISO 14001:2004 – “Environmental Management Systems – Specification with Guidance for Use” and Occupational Health and Safety Assessment Series (OHSAS) 18001:2007- “Occupational Health and Safety Management Systems – Specification.”



[Link to IGD 1000](#)



General – IGD 1000

- ▶ Contains program definitions (i.e. EMR, impact, aspect etc.)
- ▶ Purposes of each IGD
- ▶ Brief definition of each IGD and corresponding ISO 14001 requirement
- ▶ IGD format/outline
 - ▶ Purpose
 - ▶ Process
 - ▶ Examples



ESOH Policy – IGD 1001

- ▶ Ensures the continual development, review and approval of the Environmental, Safety and Occupational Health Policy Statement
- ▶ Specifically ensures adherence to the ESOH Policy Statement
- ▶ ESOH Policy Statement is reviewed at least annually by the Directorate of Material Management and policy review committee
- ▶ Effective communication of policy by management
- ▶ Several supporting documents on [lamthekey](#)
- ▶ Establishes framework for the ESOHMS



DLA Strategic Materials' ESOHMS Policy



DEFENSE LOGISTICS AGENCY
HEADQUARTERS
8725 JOHN J. KINGMAN ROAD
FORT BELVOIR, VIRGINIA 22060-6221

October 24, 2013

MEMORANDUM FOR ALL DEFENSE LOGISTICS AGENCY (DLA) STRATEGIC MATERIALS

SUBJECT: Environmental, Safety and Occupational Health Management System (ESOHMS) Policy

Environmental, Safety, and Occupational Health (ESOH) management must be a sound, useable business practice for systematically upgrading the overall performance of the DLA Strategic Materials. It must be a daily and active tool used by all to accomplish our mission and meet our strategic goals.

We will continue our commitment to ESOH stewardship by reducing risk and pollution, and assuring compliance with legal and other requirements that relate to our ESOH aspects. Our ESOHMS must be an integral part of our work with contractors, host facility owners, communities, and employees to provide ever-improving support for the war-fighter.


Therefore, I am directing that we maintain, improve, and use the mission-focused ESOHMS in order to conform to the International Organization for Standardization ISO 14001 Standard. To assure that we realize full value from this practice, we will continue to conduct periodic conformance and compliance audits at each manned depot.

We will integrate the ESOHMS into our missions, activities, and functions as a sound business practice for improving overall performance. We will collaborate with the DLA Field Activities and Installation Support to set and implement objectives and targets that improve ESOH and mission performance. Strategic Materials leaders will ensure that this policy is communicated to all employees and contractors who work on our behalf. This policy statement will be posted on the "I Am The Key" Web site to inform the public of our commitment.

We will strive to support our customers, the DLA mission and our strategic goals; and make efforts to continually improve our ESOH management practices. As employees, your active leadership, personal commitment, and involvement are essential to meeting these goals.

Caution: Hard copies of this document may not be the current version. Refer to the "I Am The Key", to verify the current version.




RONNIE FAVORS
Administrator



ESOH Policy – IGD 1001

- ▶ ESOH Policy Key Elements
 - ▶ Addressing the ESOHMS Policy's support of mission objectives
 - ▶ Complying with the requirements of all relevant ESOH laws and regulations, and our policies and procedures
 - ▶ Fostering dialogue regarding the potential operation impacts
 - ▶ Promoting pollution prevention
 - ▶ Addressing legal and other requirements as applicable
 - ▶ Continually improving ESOH performance through training and planning

[Link to IGD 1001](#)



Environmental Aspects - IGD 1002

- ▶ Identifies the “Environmental Aspects” and “Safety and Occupational Health Risks” of each Depot
 - ▶ Some currently under HQ revisions (updated annually)
- ▶ Includes those activities, commodities and services that the Depot can control or over which it can be expected to have an influence
 - ▶ Air emissions/water discharges
 - ▶ Hazardous/solid waste
 - ▶ Spills/nuisances
 - ▶ Operations, resources, and energy use
 - ▶ Emergency personnel
- ▶ ESOH Risk Analysis Worksheet/Ranking System
 - ▶ SxOxDxR=risk priority #(RPN), RPN>100 is considered significant
- ▶ Significant ESOH Aspects
 - ▶ Lead to Objectives and Targets



[Link to IGD 1002](#)



Environmental Aspects – IGD 1002

- ▶ **Process Environmental Aspect Identification**
 - ▶ Used to identify the environmental aspects of a particular process (ex: fluorescent bulbs)- [Table 1A](#)
- ▶ **Process Hazard Identification and Risk Assessment**
 - ▶ Used to calculate the hazards and risks associated with a particular process (ex: fire)- [Table 1B](#)
- ▶ **ESOH Risk Analysis Worksheet**
 - ▶ Used to determine whether a particular risk is significant - [Table 1C](#)
- ▶ **Significant ESOH Aspects** (Table 2, communicated to employees annually)



Legal and other Requirements IGD 1003

- ▶ Establishes and maintains the process for identifying and accessing legal and other requirements that headquarters and Depot personnel adopt
- ▶ Incorporates all environmental aspects, and safety and occupational health risks
- ▶ Local, State, and Federal regulations communicated among Environmental team and distributed to employees as necessary



[Link to IGD 1003](#)



Legal and other Requirements IGD 1003

- ▶ Includes
 - ▶ ESOHMS policy
 - ▶ Federal, state, local laws/regs
 - ▶ Non-regulatory guidelines (benchmarks, DLA standards)
 - ▶ DoD, DLA policies
- ▶ NEPA, OSHA, CAA, CWA, SDWA, TSCA, RCRA, CERCLA, RTK



Objectives and Targets

IGD 1004

- ▶ Establish, maintain and document environmental, safety and occupational health objectives, targets and programs at the Depots
- ▶ Stems from EO 13423
 - ▶ Ex: Reduce # of ergonomic strains by 20% by 2012
- ▶ Objectives and targets link to the relevant functions and activities at the Depots with its "Significant Environmental Aspects" and "Safety and Occupational Health Risks"
- ▶ Employee Performance Appraisals



[Link to IGD 1004](#)



ESOH Management Program IGD 1005

- ▶ Execute and maintain programs for achieving ESOH objectives and targets
- ▶ Include process improvements as well as natural resource programs, supporting mission and commitment to continual improvement
- ▶ Employee involvement in successful implementation



[Link to IGD 1005](#)



ESOH Management Program

IGD 1005 Plans and programs include

- ▶ Ergonomic plan
- ▶ Pest management plan
- ▶ Radiation, respiratory, and hearing protection plans
- ▶ Asbestos, mercury
- ▶ Confined space
- ▶ Medical surveillance/work related injuries



PLAN Summary

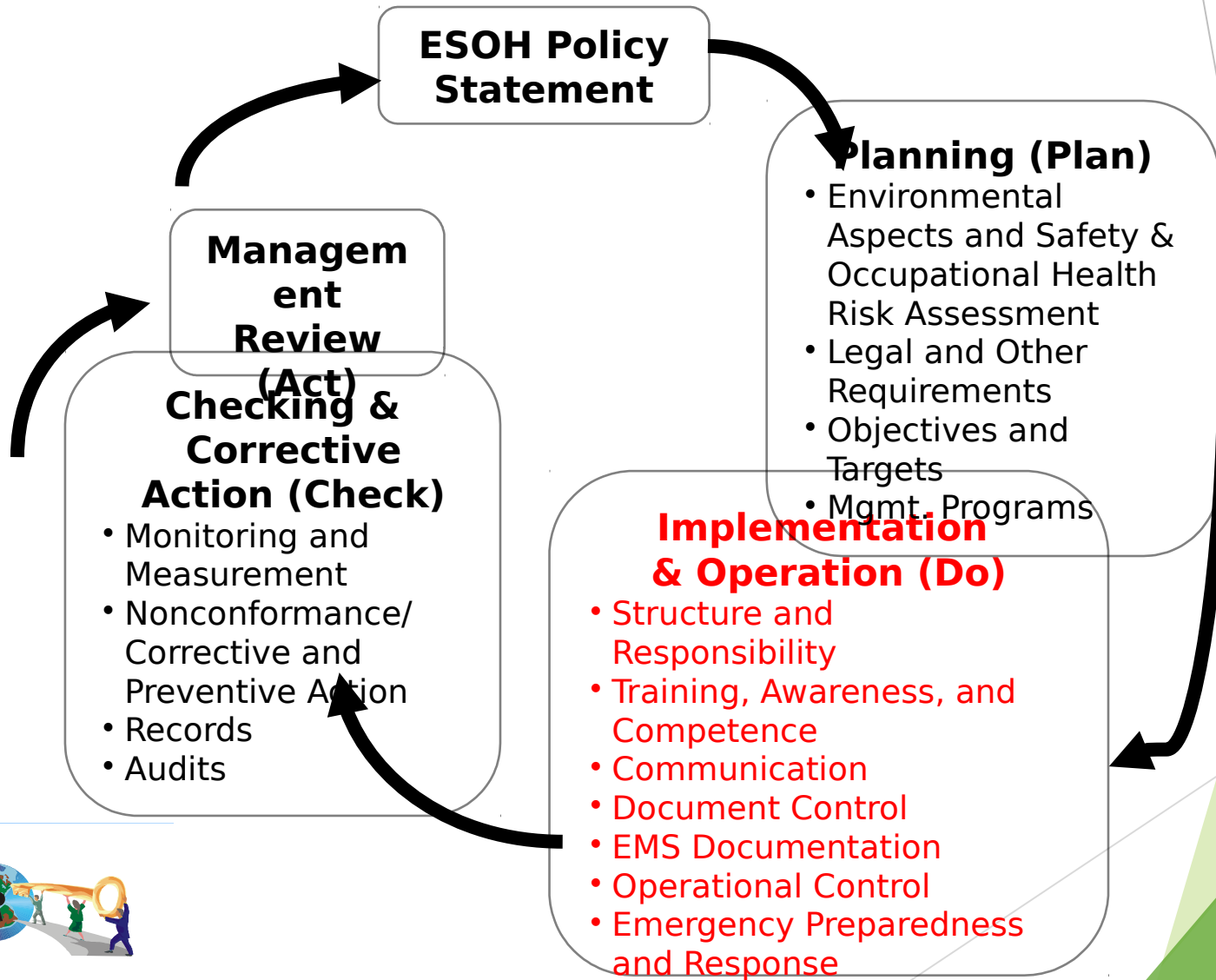
- ▶ IGDs for the following ESOH elements are located on iamthekey:
 - ▶ *General (IGD 1000)*
 - ▶ *ESOH Policy (IGD 1001)*
 - ▶ *Environmental Aspects (IGD 1002)*
 - ▶ *Legal and Other Requirements (IGD 1003)*
 - ▶ *Objectives and Targets (IGD 1004)*
 - ▶ *ESOH Management Programs (IGD 1005)*
 - ▶ *Occupational Health and Safety Management Programs (IGD 1005)*



ESOHMS Do

September 2014

Picturing the ESOHMS



DO

**WE DO WHAT WE SAID
WE WERE GOING TO DO
IN PLANNING**

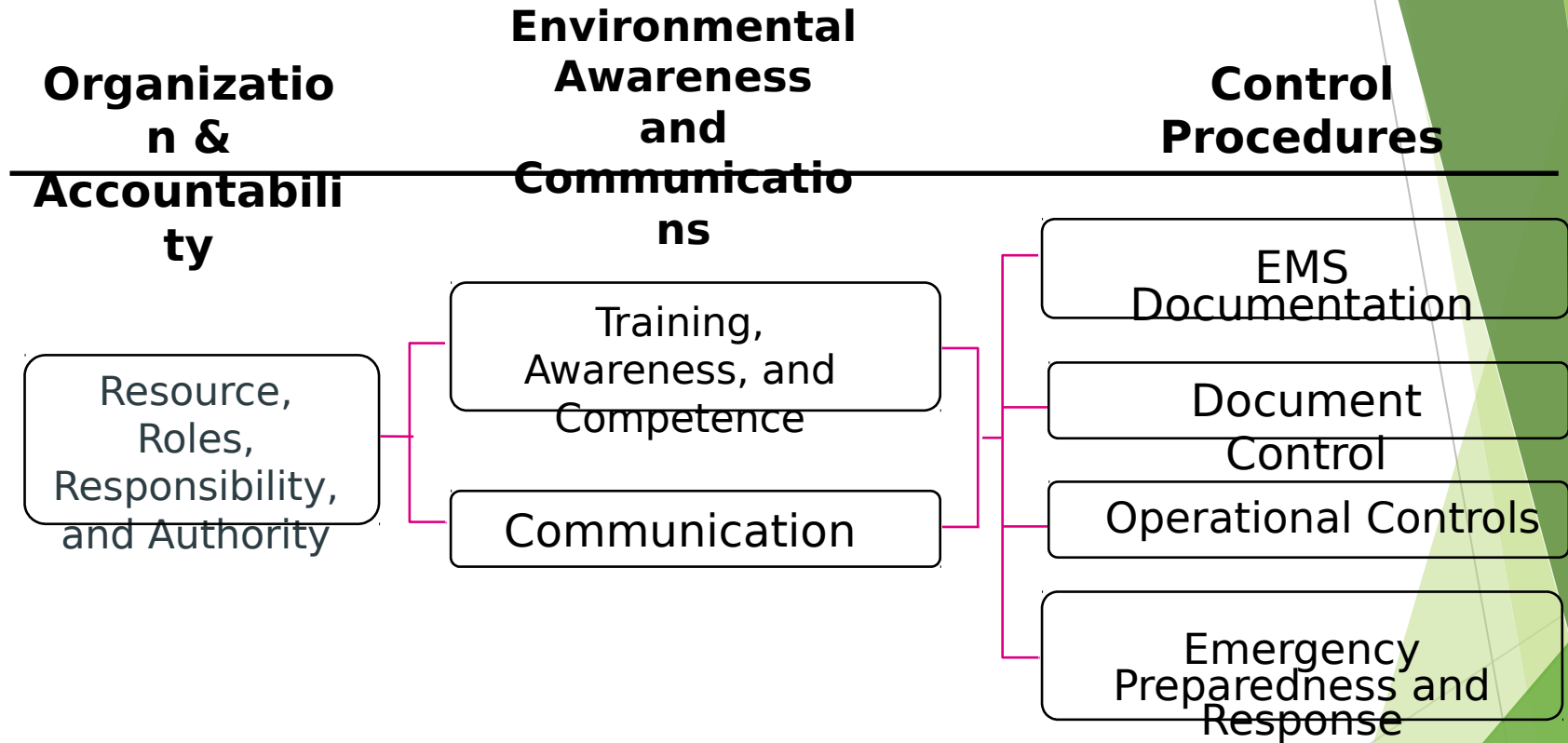


DO Agenda

- ▶ Requirements and IGD Overview:
 - ▶ Resources, Roles, Responsibility, and Authority (IGD 1006)
 - ▶ Training, Awareness, and Competence (IGD 1007)
 - ▶ Communications (IGD 1008)
 - ▶ Documentation (IGD 1009)
 - ▶ Control of Documents (IGD 1010)
 - ▶ Operational Control (IGD 1011)
 - ▶ Emergency Preparedness and Response (IGD 1012)



DO



Resources, Roles, Responsibilities, and Authority – IGD 1006

- ▶ Defines, documents, and communicates roles, responsibilities, and authorities required to facilitate effective environmental, safety and occupational health management



[Link to IGD 1006](#)



Resources, Roles, Responsibilities, and Authority – IGD 1006

- ▶ ESOH Management Representative (EMR)
 - ▶ Appointed by the Administrator
 - ▶ Reviews and provides oversight of the ESOH management system
 - ▶ Recommendations items to promote continual improvement
 - ▶ Provides periodic updates to the Administrator
 - ▶ Responsible for reviewing and directing ESOH activities (policies, laws, BMPs, value, permitting, training)



Resources, Roles, Responsibilities, and Authority – IGD 1006

- ▶ Environmental Monitor
 - ▶ Reviews ESOHMS w/respect to depot operations compliance
 - ▶ Ensures and documents depot personnel have required training (initial, continuing)
 - ▶ Maintains depot env. library and files (env. issues matrix)
 - ▶ Updates stormwater/spill control plans (where required)
 - ▶ Collects and reports data for EMS metrics and practices
 - ▶ Other duties – depot specific



Training, Awareness, and Competence – IGD 1007

- ▶ Identifies training needs for those whose responsibilities may create a significant impact on the environment or significant SOH risk
- ▶ Describes procedures that will ensure awareness of the important ESOH issues
- ▶ Management is responsible for ensuring that training is provided to achieve an appropriate level of ESOH competence and awareness



[Link to IGD 1007](#)



Training, Awareness, and Competence - IGD 1007

▶ Training

- ▶ Job function training (for example DOT and HAZMAT training)
- ▶ Environmental program training (stormwater management)
- ▶ Safety training (ESOH topics and the ESOHMS as discussed during the monthly depot Safety Meetings)



Training, Awareness, and Competence - IGD 1007

- ▶ Accomplished via
 - ▶ Individual Development Plans (IDP). Each employee is responsible to identify training requirements with their supervisor and complete the IDP.
 - ▶ Information on the approved IDP is entered into the Learning Management System (LMS). LMS tracks the training completion and issues certificates of completion.
 - ▶ Records for environmental training initiated at the depot level will be maintained at each respective depot.



Training, Awareness, and Competence - IGD 1007

- ▶ Training Types
 - ▶ New employee orientation
 - ▶ Specific, job-related and technical
 - ▶ Environmental compliance
 - ▶ Environmental awareness
 - ▶ Safety and Occupational Health
 - ▶ Emergency response
 - ▶ ESHOMS training
 - ▶ Other internal communication vehicles



Training, Awareness, and Competence - IGD 1007

- ▶ Supporting Information
 - ▶ [ESOHMS Manual](#)
 - ▶ [ESOH Management System Pocket Guide](#)



Communication – IGD 100

100

- ▶ Describes how incoming ESOH communications are received, responded to, and documented
- ▶ Significant environmental aspects are communicated via [IAmTheKey](#)
- ▶ Handles both internal and external communication
- ▶ IGD 1008 [Figure 1](#) communications flowchart



[Link to IGD 1008](#)



Communication – IGD

1008

▶ Internal Communication

- ▶ Environmental Awareness Training, procedures and policy
- ▶ Publications of general or specific topics of interest (environmental aspects and their impacts)
- ▶ Various group, directorate, and depot meetings (safety/environmental meetings and pre-work conferences)
- ▶ E-mail
- ▶ Annex to the DLA Communication Plan

▶ External Communication

- ▶ Community Relations Plans
- ▶ News media
- ▶ Elected official list
- ▶ lamthekey



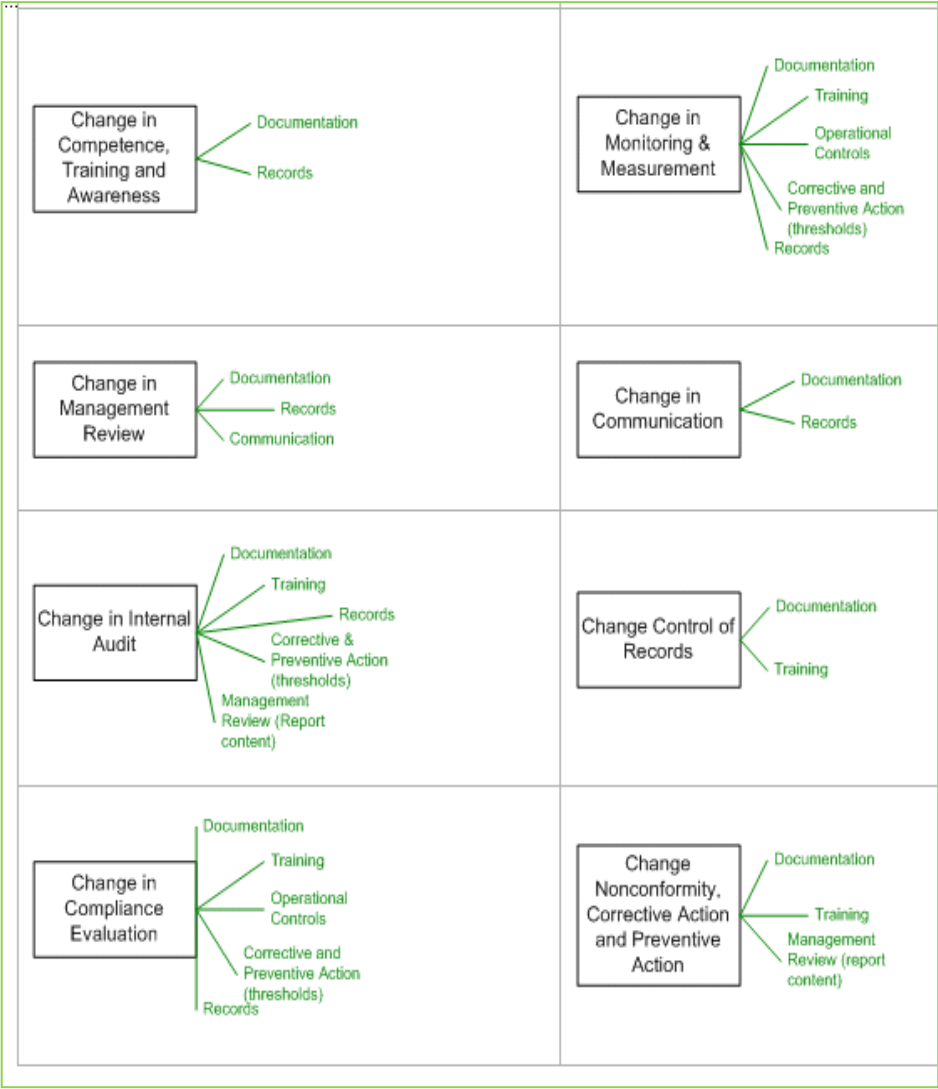
Documentation - IGD 1009

- ▶ Describes the core elements of the ESOHMS as it relates to our operations and activities
- ▶ Provides direction where to obtain detailed information on specific elements of the ESOHMS
- ▶ Includes documentation of the policy, environmental aspects, objectives and targets and those documents for planning, organization and control of processes that relate to the environmental aspects

[Link to IGD 1009](#)







Control of Documents IGD 1010

- ▶ Provides guidance for controlling all documents, internal and external
- ▶ Controlled documents are listed on the Document Review/Revision Matrix



[Link to IGD 1010](#)



Control of Documents

IGD 1010

- ▶ EMR is responsible for approval authority, approval prior to use, review and revision, revision status identification, availability at point of use, legibility and methods for identification of controlled documents
- ▶ Controlled documents are controlled by the document control methods to ensure that the documents:
 - ▶ Are Approved prior to use
 - ▶ Can be readily located
 - ▶ Are periodically reviewed, revised, and approved or deleted as necessary
 - ▶ Are available at applicable locations
 - ▶ Are legible, dated (with revision dates, if applicable), readily identifiable
 - ▶ Are appropriately maintained by either headquarters or depots
 - ▶ All original documents that are received or issued by headquarters or a depot must be retained on file for future review and/or audit purposes



Operational Control

IGD 1011

- ▶ Ensures that all operations and activities associated with the Environmental, Safety and Occupational Health Significant Environmental Aspects are consistent with the ESOH Policy Statement and specified objectives and targets, policy, and legal and other requirements



[Link to IGD 1011](#)



Operational Control IGD 1011

- ▶ Operations and Logistics Storage Manual
 - ▶ Master document outlining all storage management, security, inspection, sampling, administration, H&S, and evaluations aspects of depot operations and logistics
 - ▶ Currently in revision



Emergency Preparedness and Response - IGD 1012

- ▶ Provides guidance on site planning for identifying, preventing, and responding to environmental and safety and health emergencies



[Link to IGD 1012](#)



Emergency Preparedness and Response - IGD 1012

- ▶ Examples of emergency preparedness and response plans and procedures for individual installations
 - ▶ Spill Prevention, Control and Countermeasures Plan
 - ▶ Emergency and Preparedness and Response Plans on lamthekey(password protected)
- ▶ Plans are reviewed and revised as necessary
- ▶ ESOH emergencies are reported as required



DO Summary

- ▶ IGDs for the following ESOH elements are located on lamthekey:
 - ▶ *Resources, Roles, Responsibility, and Authority*
 - ▶ *Training, Awareness, and Competence*
 - ▶ *Communications*
 - ▶ *Documentation*
 - ▶ *Control of Documents*
 - ▶ *Operational Control*
 - ▶ *Emergency Preparedness and Response*



ESOHMS

Check & Act

Prepared for DLA Strategic Materials
September 2014

AGENDA

0800	Agenda Review/ Introductions
0815	ESOHMS 101
0845	MOC
0930	Break
0945	Plan Elements: Details & Changes
1030	Do Elements: Details & Changes
1115	Break
1130	Check & Act: Details & Changes
1200	Questions & Adjourn



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CHECK & ACT Agenda

- ▶ Requirements and IGD overview:
 - ▶ Monitoring and Measurement
 - ▶ Evaluation of Compliance
 - ▶ Nonconformity, Corrective Action, and Preventative Action
 - ▶ Control of Records
 - ▶ Internal Audit
 - ▶ Management Review



Monitoring and Measurement IGD 1013

- ▶ Identifies documents and procedures used to monitor and measure characteristics of operations and activities that may have a significant impact on DLA Strategic Materials' ESOH aspects



[Link to IGD 1013](#)



Monitoring and Measurement IGD Updates

- ▶ Added specific procedures for measuring potential problems and associated equipment
- ▶ Added examples of monitoring equipment that require periodic scheduled calibrations
 - ▶ Examples include scales, Geiger counters, and Jerome mercury vapor monitors
- ▶ Continue to calibrate equipment based on the schedule outlined in manufacturer's specs, even if the equipment is not used often



Evaluation of Compliance IGD 1014

- ▶ Identifies procedures used to periodically evaluate compliance of DLA Strategic Materials' ESOH programs with applicable legal and other requirements



[Link to IGD 1014](#)



Evaluation of Compliance IGD Updates

- ▶ Added the procedure for conducting a triennial environmental compliance audits
 - ▶ Listed media areas included in the audit
 - ▶ Listed audit activities, including records review, personnel interviews, and site walk-through
- ▶ Included summary of audit follow-up actions
 - ▶ References IGD 1015, root cause analysis procedure, and MOC procedure
 - ▶ Review and update applicable ESOH policies and procedures, as needed



Nonconformity, Corrective Action, and Preventive Action IGD 1015

- ▶ Establishes responsibility and authority for completing the following actions:
 - ▶ Identifying, handling, and investigating nonconformances and potential nonconformances
 - ▶ Mitigating resulting impacts
 - ▶ Initiating and completing corrective and preventive action
 - ▶ Includes results and effectiveness of corrective action



[Link to IGD 1015](#)



Nonconformity, Corrective Action, and Preventive Action IGD 1015

- ▶ DLA Strategic Materials documents nonconformances and noncompliances in the Corrective Action Summary Report (CASR)
 - ▶ The CASR is used to monitor corrective action
- ▶ The Corrective Action Coordinator (CAC) has primary responsibility for the process
- ▶ Root cause analysis (5 Whys) is in IGD 1015a
 - ▶ Most findings will not need a root cause analysis; the EMR/CAC makes this determination. Findings and/or nonconformances without a quick resolution are the best candidates for RCA.



Corrective Action Process

Identifies audit finding (nonconformance) and probable root cause
Forwards to CAC

Fills out the CASR fields for location (storage site or HQ), finding, probable root cause, auditor name, and audit date

Work with the EMR to identify the Action Officer for each finding

Complete the root cause analysis, corrective and preventive action, and due date in collaboration with the Depot Managers and Action Officers

Update the CASR to reflect status updates

Complete the corrective and preventive action

Provide status updates on corrective and preventive action completion to CAC



Control of Records

IGD 1016

- ▶ Provides guidance with respects to the identification, maintenance and disposition of environmental records in relation to DLA Strategic Materials installations and host/tenant agencies (as applicable).
- ▶ Records may include the following:
 - ▶ Training records
 - ▶ Inspection records
 - ▶ Compliance assessment records
 - ▶ Corrective action records
 - ▶ External communication records



[Link to IGD 1016](#)



Documents vs Records: What's the difference?

Documents: Management plans, procedures, instructions, or drawings to assist with information flow

- Documents should be edited to reflect changes

Records

Evidence that an action/ activity occurred

- Records are historical evidence that should never be altered



Control of Records

IGD 1016

- ▶ Maintenance & Storage
 - ▶ At all times, records should be readily legible, protected, and available for inspection
 - ▶ Preference is electronic by hard copy is acceptable
- ▶ Retention
 - ▶ Retention schedule is dictated by regulatory or judicial standards (minimum 3 years for environmental documents, 6 years and 3 months for financial documents)



Internal Audits

IGD 1017

- ▶ Provides guidance for preparation and conducting periodic internal audits of DLA Strategic Materials' ESOHMS
- ▶ A complete audit of all ESOH elements will take place annually



[Link to IGD 1017](#)



Internal Audits

IGD 1017

- ▶ Scope includes:
 - ▶ Review of records, the ESOHMS Manual, and documents and records that support environmental compliance
 - ▶ Personnel interviews
 - ▶ Site walk-through



Internal Audits

IGD 1017

- ▶ Audit follow-up actions include the following:
 - ▶ Draft a report summarizing findings
 - ▶ Document findings in the CASR
 - ▶ As requested by the EMR, conduct a root cause analysis for certain findings
 - ▶ Review and update applicable ESOH policies and procedures, as needed



Management Review

IGD 1018

- ▶ What is a Management Review?
 - ▶ ISO/OHSAS: A regularly scheduled opportunity for top management to review the management system and ensure continuing suitability, adequacy, and effectiveness.
 - ▶ Review of the progress in meeting objectives and targets and improving the overall ESOHMS process
 - ▶ Can also be considered as risk management!
 - ▶ Used effectively these meetings reduce organizational vulnerability.



[Link to IGD 1018](#)



Management Review

IGD 1018

- ▶ Provides guidance for the annual “Top Management” reviews of DLA Strategic Materials’ ESOHMS
 - ▶ Administrator and Deputy Administrator
 - ▶ Others may be involved such as:
 - ▶ Depot Managers
 - ▶ Director of Material Management



Management Review

IGD 1018

- ▶ Management review inputs include:
 - ▶ Results of audits
 - ▶ Communication(s) from external interested parties
 - ▶ ESOH performance of the organization
 - ▶ Extent to which objectives and targets have been met
 - ▶ Status of corrective and preventive actions
 - ▶ Follow-up actions from previous management reviews
 - ▶ Changing circumstances, including regulatory developments
 - ▶ Recommendations for improvement
- ▶ Outputs include decisions and actions related to the management system



CHECK & ACT Summary

- ▶ IGDs for the following ESOH Elements are located on [lamthekey](#):
 - ▶ Monitoring and Measurement
 - ▶ Evaluation of Compliance
 - ▶ Nonconformity, Corrective Action, and Preventative Action
 - ▶ Control of Records
 - ▶ Internal Audit
 - ▶ Management Review



ESOHMS Management of Change

Prepared for DLA Strategic Materials
September 2014

**ESOH Policy
Statement**

NEW ELEMENT

Management of Change!!!

**Not part of the ISO 14001 standard but
ties back to many elements**

- Communication
- Document Control
- EMS Documentation
- Operational Control
- Emergency Preparedness
and Response



Purpose of Management of Change (MOC)

- ▶ Provides a framework for identifying changes and evaluating changes for potential environmental impacts
- ▶ Process for making sure environmental considerations, including regulatory compliance, are taken into account when changes occur



Why is this important?

- ▶ Not considering the environmental or health and safety impacts associated with changes can lead to:
 - ▶ Unneeded regulatory burdens
 - ▶ Being out of compliance
 - ▶ Lack of training for employees
- ▶ DLA SM has documented a MOC process in IGD 1019 on [IAMTHEKEY](#)



What is considered a change?

- ▶ A change is an action or process that occurs outside of normal operating conditions
 - ▶ Example 1: In accordance with the depot's operating procedure, a normal shipment of material is delivered and the stockpile changes in size.
 - ▶ This is NOT a change because it is within the parameters of the normal operating procedures
 - ▶ Example 2: A new material arrives at the depot and there is no standard procedure for handling it.
 - ▶ This is a change. The environmental, health, and safety impacts of the material need to be considered through the MOC process
 - ▶ IGD 1019 Appendix A Section 1 can help identify if there is a change
 - ▶ Will be discussed in more detail later



IGD 1019 MOC Responsibilities

- ▶ There are three primary roles in the MOC process:
 - ▶ Project/ Change Proponent
 - ▶ Environmental Management Representative (EMR)
 - ▶ MOC Review Team
 - ▶ At least two potentially impacted DLA Strategic Materials employees
 - ▶ If the potential change could impact a depot, a depot representative must be included



DLA SM EMSM Management of Change Process

IGD 1019

DLA SM Project Initiator

EMR

MOC Review Team

Becomes aware of a potential change outside of normal DLA SM procedures

Notifies the EMR

Creates MOC Team of knowledgeable employees

Reviews and approves completed IGD 1019 Appendix A

Are changes identified in Section 3 IGD 1019 Appendix A?

No

No further action is needed before change can occur

Completes IGD 1019 Appendix A: Management of Change Checklist

MOC Review Team implements actions outlined in Appendix A, Section 3 table

MOC Review Team documents actions and progress to completion

No further action is needed before change can occur

Yes



MOC Checklist (Appendix

A)

- ▶ There are three sections of MOC Checklist (Appendix A of the MOC IGD):
 - ▶ **Section 1:** Check All Changes Applicable to the Planned Project
 - ▶ **Section 2:** Check the Environmental Aspects Affected by the Planned Change
 - ▶ **Section 3:** For the Affected Environmental Aspects identified in Section 2, identify specific changes and create an action plan
- ▶ **Checklist is on [IAMTHEKEY](#)**



MOC Checklist: Section 1

- ▶ **Section 1** lists potential changes
 - ▶ Can help determine whether or not there is a change requiring attention
 - ▶ If you do find that something will change, move onto Sections 2 and 3 of the Checklist
- ▶ *For Example: A new warehouse is going to be built*

Section 1: Check Applicable Changes

1.1 Organization

- Management
- Environmental staff
- Other personnel changes

1.2 Infrastructure

- Construction or demolition of buildings
- Modification of utilities
- Sewer or storm water conveyance

1.3 Equipment/Machinery or part thereof

- Installation of new equipment
- Replacement of equipment
- Modification and/or reconstruction of equipment
- Removal/ relocation of equipment



MOC Checklist: Section 2

- ▶ Section 2 lists environmental issues that may be impacted by the change
 - ▶ After reviewing Section 2, move to Section 3
- ▶ *For example: Constructing a warehouse will change the flow of storm water at the sites.*

Section 2: Check the Environmental Aspects Affected by the Planned Change

- Energy Efficiency (energy consumption per unit of raw material/ product)
- Air Emissions
 - New air emissions sources
 - Fugitive emissions (dust, odor)
- Noise/Vibrations
- Wastewater or Stormwater discharge
 - Flow
 - Temperature |
 - Composition (new components)
 - Concentrations of pollutants/substances, such as pH or suspended solids



MOC Checklist: Section 3

- ▶ Section 3 is designed to help determine which parts of the ESOHMS will need to be updated to minimize negative impacts from the change
- ▶ *For example: The warehouse construction project might require a new storm water permit and associate storm water training. At a minimum, the construction project needs to be added to the*

Section 3: For the Affected Environmental Aspects identified in Section 2, are there changes to:

- Legal & Permit requirements/ EMS Legal Registry
- Roles and Responsibilities
- Work instructions/ SOPs/ Plans
- Training needs
- EMS Aspect Inventory
- NEPA Documentation



MOC Checklist: Section 3

- ▶ After filling out the checklists in Sections 1-3, an action plan to handle the changes needs to be created.
 - ▶ The goal of the Action Plan is mitigate, as much as possible, any negative environmental, health, or

Briefly describe actions to be taken to address environmental impacts from the change, when they will be addressed and who is responsible for the changes:

Actions	Who is responsible for Action?	Action Due Date	Notes
Determine if a storm water permit is needed for warehouse construction project	J. Doe	9/24/2014	Completed 9/23/14. Permit IS needed.
Complete permit application	J. Doe	11/1/2014	
Submit permit request to the state	R. Smith	11/2/2014	



MOC & the rest of ESOHMS

- ▶ Which elements is MOC most likely to impact?
 - ▶ Aspect & Impact Inventory (IGD 1002)
 - ▶ Legal & Other Requirements (IGD 1003)
 - ▶ Training (IGD 1007)
 - ▶ Operational Controls (IGD 1011)



Example of NEPA Documentation: Environmental Assessments

- ▶ Required by the National Environmental Policy Act (NEPA) and DLAR 1000.22
- ▶ Generally prepared for projects that the proposing agency views as having **potential** environmental impacts
- ▶ Prepared by a Federal agency to provide sufficient evidence and analysis to determine whether a proposed agency action would require preparation of an environmental impact statement or a finding of no significant impact (FONSI)
- ▶ Helps to identify better alternatives and mitigation measures
- ▶ Finding of No Significant Impact (FONSI) and EA available for 30 days of public comment before taking action
- ▶ Categorical Exclusions



Environmental Assessments Cont.

- ▶ Examples of types of actions subject to environmental review include but are not limited to:
 - ▶ Policies, regulations, and procedures
 - ▶ New management and operational concepts and programs
 - ▶ Projects involving facilities construction or change in installation land use that may alter environmental conditions
 - ▶ Materiel development, operation and support, disposal, and/or modification
 - ▶ Major changes in mission or facilities affecting environmentally sensitive resources or causing significant environmental impact
 - ▶ Leases, permits, licenses
 - ▶ Actions that result in significant or uncertain environmental effects, or unique or unknown environmental risks.

**If it is known that the proposed action being considered with have a significant impact on the human environment, an EIS will be prepared directly without an EA*



Details included in an EA

- ▶ An EA shall contain a brief discussion of the following:
 - ▶ Purpose/need for the action
 - ▶ Description of the proposed action
 - ▶ Alternatives considered
 - ▶ Affected environment
 - ▶ Environmental Consequences
 - ▶ Conclusion regarding the impacts of the proposed action
 - ▶ Listing of preparers, agencies and persons consulted
 - ▶ References



Questions?



Certificate of Completion

This certifies that

*has successfully completed annual DLA Strategic
Materials Environmental, Safety, and Occupational
Health System training on*

Instructor(s) signature:

